

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and HELEN  
LOVELACE, Individually, and as Parents of  
BRETT LOVELACE, deceased,

Plaintiffs,

vs.

NO.: 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI ; and,  
MARK P. CLEMONS,

Defendants.

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**NOTICE OF OBJECTION TO REQUEST FOR PRODUCTION OF DOCUMENTS**

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Come the Plaintiffs, Daniel Lovelace and Helen Lovelace, Individually, and as Parents of Brett Lovelace, deceased, by counsel, who for their Notice of Objection to Request for Production of Documents, state:

1. Defendants filed Notices to Take Depositions of Plaintiffs' experts, Robert E. "Jay" Marsh [D.E. 109, 110]; Dr. Frank J. Peretti [D.E. 111]; and Dr. Jason Kennedy [D.E. 115], which depositions are allowable by law.
2. These Notices to take said depositions contain requests for documents from Plaintiffs' experts.
3. Said Notices' requests for Plaintiffs' experts to provide documents, items and things do not meet or comply with either Rule 30(b)(2), nor Rule 34(b)(2)(A), F.R.C.P.
4. Defendants are hereby notified that Plaintiffs intend to follow the Federal Rules of Civil Procedure as respects said noticed depositions; however, said documents will not be produced in the

time, form and manner requested, as the document requests do not comply with the aforesaid Rules, and are, therefore, void.

Respectfully submitted,

**HALLIBURTON & LEDBETTER**

/s/ Mark Ledbetter  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon the following counsel of record via the Court's ECF filing system this 9<sup>th</sup> day of June, 2014:

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/s/ Mark Ledbetter